

Exhibit 4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

BENEFYTT TECHNOLOGIES, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-90566 (CML)
)
)
)

**DECLARATION OF SHERYL BETANCE IN SUPPORT
OF DEBTORS' EMERGENCY EX PARTE APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF STRETTO, INC. AS CLAIMS, NOTICING, AND SOLICITATION AGENT**

I, Sheryl Betance, under penalty of perjury, declare as follows:

1. I am a Senior Managing Director of Stretto, Inc. ("Agent"), a chapter 11 administrative services firm whose headquarters are located at 410 Exchange, Ste. 100, Irvine, California 92602. Except as otherwise noted in this declaration (this "Declaration"), I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently as follows.

2. I submit this Declaration in support of the above-captioned Debtors' (collectively, the "Debtors") Emergency Ex Parte Application for Entry of an Order Authorizing the Employment

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Benefytt Technologies, Inc. (2634); American Service Insurance Agency LLC (9115); Benefytt Reinsurance Solutions, LLC (4601); BimSym-HPIH, LLC (4626); Dawn Acquisition Company, LLC (0909); Daylight Beta Intermediate Corp. (7248); Daylight Beta Intermediate II Corp. (8842); Daylight Beta Parent Corp. (6788); Health Insurance Innovations Holdings, Inc. (1994); Health Plan Intermediaries Holdings, LLC (0972); Healthinsurance.com, LLC (9525); HealthPocket, Inc. (3710); Insurance Center for Excellence, LLC (4618); RxHelpline, LLC (9940); Sunrise Health Plans, LLC (3872); TogetherHealth Insurance, LLC (9503); TogetherHealth PAP, LLC (8439); and Total Insurance Brokers, LLC (7975). The location of the Debtors' service address is: 3450 Buschwood Park Drive, Suite 200, Tampa, Florida 33618.

and Retention of Stretto, Inc. as Claims, Noticing, and Solicitation Agent, filed contemporaneously herewith (the “Application”).²

3. Agent represents the following:

- (a) Agent, its members, and employees are not and were not, within two years before the date of the filing of these chapter 11 cases, creditors, equity security holders, insiders, or employees of the Debtors;
- (b) Agent will not consider itself employed by the United States government and shall not seek any compensation from the United States government in its capacity as the Claims and Noticing Agent in these chapter 11 cases;
- (c) by accepting employment in these chapter 11 cases, Agent waives any rights to receive compensation from the United States government in connection with these chapter 11 cases;
- (d) in its capacity as the Claims and Noticing Agent in these chapter 11 cases, Agent will not be an agent of the United States and will not act on behalf of the United States;
- (e) Agent will not employ any past or present employees of the Debtors in connection with its work as the Claims and Noticing Agent in these chapter 11 cases;
- (f) Agent is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code with respect to the matters upon which it is engaged;
- (g) in its capacity as Claims and Noticing Agent in these chapter 11 cases, Agent will not intentionally misrepresent any fact to any person;
- (h) Agent shall be under the supervision and control of the Clerk with respect to the receipt and recordation of claims and claim transfers;

² A detailed description of the Debtors and their businesses, including the facts and circumstances giving rise to the Debtors’ chapter 11 cases, is set forth in the *Declaration of Michael DeVries, Chief Financial Officer of Benefytt Technologies, Inc. in Support of Chapter 11 Petitions and First Day Motions* (the “First Day Declaration”), filed contemporaneously herewith on May 23, 2023 (the “Petition Date”). Capitalized terms used but not defined in this Motion have the meanings ascribed to them in the First Day Declaration.

- (i) Agent will comply with all requests of the Clerk and the guidelines promulgated by the Judicial Conference of the United States for the implementation of 28 U.S.C. § 156(c); and
- (j) none of the services provided by Agent as Claims and Noticing Agent in these chapter 11 cases shall be at the expense of the Clerk.

4. I caused to be submitted for review by our conflicts system the names of all known potential parties-in-interest (the “Potential Parties in Interest”) in these chapter 11 cases. The results of the conflict check were compiled and reviewed by Agent professionals under my supervision. Agent is not aware of any connection that would present a disqualifying conflict of interest. Should Agent discover any new relevant facts or connections bearing on the matters described herein during the period of its retention, Agent will use reasonable efforts to promptly file a supplemental declaration.

5. To the best of my knowledge, neither Agent, nor any of its professionals, has any materially adverse connection to the Debtors, their creditors, or other relevant parties. Agent may have relationships with certain of the Debtors’ creditors as vendors or in connection with cases in which Agent serves or has served in a neutral capacity as claims and noticing agent and/or administrative advisor for another chapter 11 debtor.

6. Agent discloses the following connections, each of which Agent believes does not present an interest adverse to the Debtors:

- In April 2017, Stretto was acquired by the Trident VI Funds managed by private equity firm Stone Point Capital LLC (“Stone Point”). Stone Point is a financial services-focused private equity firm based in Greenwich, Connecticut. The firm has raised and managed nine private equity funds – the Trident Funds – with aggregate committed capital of approximately \$40 billion. Stone Point targets investments in the global financial services industry and related sectors. Stretto has determined that NFP Corp, owned by Trident Fund VI, has been identified as a broker of the Debtors. Additionally, Stretto has determined that SunFireMatrix, Inc., owned by Trident Fund VIII, has been identified as a trade vendor of the Debtors. Further, Stretto has determined that Kroll (f/k/a Duff & Phelps) owned by Trident Fund VIII, has been identified as a contract counterparty of the Debtors. Stretto is owned by Trident VI Funds managed by private equity

firm Stone Point. However, to the best of Stretto's knowledge, Stretto's relationship to this entity does not create any adverse interest against the Debtors' estates that would present a disqualifying conflict of interest, and there are no other connections that require disclosure.

- Grant Thornton LLP has been identified as a Potential Party in Interest. John Baumgartner, a Managing Director with Grant Thornton LLP, is a current client of Stretto's depository services business in his individual capacity, but such relationship is unrelated to the Debtors and their estates, assets, or businesses.
- FTI Consulting, Inc. has been identified as a Potential Party in Interest. Guy Davis, a Senior Managing Director with FTI Consulting, Inc., is a current client of Stretto's depository services business in his individual capacity, but such relationship is unrelated to the Debtors and their estates, assets, or businesses.
- Berkley Research Group has been identified as a Potential Party in Interest. Jay Borrow, a Managing Director with Berkley Research Group, is a current client of Stretto's depository services business in his individual capacity, but such relationship is unrelated to the Debtors and their estates, assets, or businesses.
- The Potential Parties in Interest list identifies Allstate Insurance Company and Regions Bank as an employee benefit plan provider and secured creditor, respectively, of the Debtors. Allstate Insurance Company and Regions Bank are two of Stretto's lenders. However, to the best of my knowledge, such relationships are materially unrelated to these chapter 11 cases.
- The Potential Parties in Interest list identifies Western Alliance Bank as a banking institution of the Debtors. Western Alliance Bank is one of Stretto's bank vendors. However, to the best of my knowledge, such relationship is materially unrelated to these chapter 11 cases.
- The Potential Parties in Interest list identifies one of Stretto's lenders, ING Capital LLC, as an insurance carrier of the Debtors. However, to the best of my knowledge, such relationship is materially unrelated to these chapter 11 cases.
- Additionally, the list of Potential Parties in Interest includes entities, as set forth on Annex 1 attached hereto, which are current, former or potential defendants to avoidance actions brought under the Bankruptcy Code by clients of Stretto Recovery Services. However, to the best of my knowledge, such relationships are materially unrelated to these chapter 11 cases.

7. I believe that Agent is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: May 23, 2023

/s/ Sheryl Betance

Sheryl Betance
Senior Managing Director
Stretto, Inc.
410 Exchange, Ste. 100
Irvine, California 92602

Annex 1

Aetna Life And Casualty Bermuda	Tennessee Department of Revenue
Alabama Department of Revenue	Texas Comptroller of Public Accounts
Aon Risk Services, et al.	UNITED CONCORDIA CO. INC.
Arizona Department of Revenue	Utah State Tax Commission
AT&T	Virginia Department of Taxation
BANK OF AMERICA, N.A.	Vision Service Plan
CANON SOLUTIONS AMERICA INC	Washington State Department of Revenue
CDW	Wells Fargo
Colorado Department of Revenue	Wisconsin Department of Revenue
Comptroller of Maryland	
DAS Health	
Delaware Secretary of State	
Delta Dental	
Fidelity Investments	
Florida Department of Revenue	
Georgia Department of Revenue	
GREAT AMERICAN MERCHANDISE	
Idaho State Tax Commission	
Illinois Department of Revenue	
Indiana Department of Revenue	
Iowa Department of Revenue	
Iron Mountain	
Kansas Department of Revenue	
Kentucky Department of Revenue	
Kforce Inc.	
Locke Lord LLP	
Massachusetts Department of Revenue	
Minnesota Revenue	
New Mexico Taxation and Revenue	
Department	
North Carolina Department of Revenue	
Ohio Department of Taxation	
Salesforce.com, Inc.	
South Carolina Department of Revenue	
State of Connecticut	
State of Michigan	